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May 15, 2013

Ms. Jill Sugarman
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00431171

REFERENCE: AMENDED OCTOBER MONTHLY REPORT (09/01/12-09/30/2012)

Dear Ms. Sugarman,

This statement is in response to the Commission's letter dated April 11, 2013. The Commission requested additional information on two items.

First, the Commission requested clarification on political committees disclosed on Lines 17(b) and 17(c) of the Detailed Summary Page. The contributions that were under \$200.01 were inadvertently unitemized. These entries will be itemized on Schedule A-P in an Amended Report.

Second, the Commission requested clarification on contributions that appear to exceed federal limits. Most of the individuals that appear to exceed the contribution limits do not. The amount over the federal contribution limits has been refunded, reattributed within the 60 days, re-designated to the Committee's General Election Account, or reallocated through the joint fundraising committee, Romney Victory, Inc. (C00518282). These refunds and reattributions/redesignations were reflected in subsequent reports. Some individuals were mistakenly over the limit due to duplicate records. As soon as the Committee was aware, contribution refunds were issued. These refunds will be reflected on subsequent reports. Any discrepancies in aggregates or cycle designations due to duplicates or data entry errors have been corrected on the subsequently filed amendment(s). The reallocation of some individual's contributions was requested by Romney for President, Inc., but still are pending and will be reflected upon the next distribution through the joint fundraising committee, Romney Victory, Inc. (C00518282).

This should answer the Commission's inquiry.

Sincerely,

Darrell Crate
Treasurer
